

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

: Chapter 11

: Case No. 22-11068 (JTD)

: (Jointly Administered)

----- x Re:D.I. ____

**ORDER (I) MODIFYING THE AUTOMATIC STAY PURSUANT
TO 11 U.S.C. 362(d)(1) AND BANKRUPTCY RULE 4001
AND (II) GRANTING RELATED RELIEF**

This matter coming before the Court on the motion (the “Motion”) filed by the Joint Liquidators² for entry of an Order (a) lifting the automatic stay in the chapter 11 cases to allow the commencement and adjudication of the 3AC Claims before the BVI Court, or, in the alternative, before the Chapter 15 Court, and (b) granting related relief; and, after due deliberation, the Court having concluded that the Joint Liquidators have established sufficient cause for the relief granted herein; and no additional notice being required, now, therefore, it is hereby ORDERED that:

1. The Motion is **GRANTED** as set forth herein.
2. The automatic stay is lifted pursuant to Bankruptcy Code section 362(d) and Bankruptcy Rule 4001 for the purpose of allowing the Joint Liquidators to commence and adjudicate the 3AC Claims against the FTX Debtors before the [BVI Court / Chapter 15 Court].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not defined herein have the meaning ascribed to them in the Motion.

3. The rights of the FTX Debtors and 3AC with respect to allowance and distribution of the 3AC Claims in the FTX Debtors' chapter 11 cases are expressly reserved.

4. This Order is without prejudice to any and all other rights of the 3AC Debtor with respect to the 3AC Claims, all of which are hereby reserved.

5. The parties are authorized, but not directed, to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. Notice of the Motion as provided therein shall be deemed good and sufficient.

7. The relief granted in this Order shall be effective immediately and shall not be subject to the 14-day stay of enforcement under Federal Rule of Bankruptcy Procedure 4001(a)(3).

8. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.